

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FRESNO COUNTY EMPLOYEES' RETIREMENT  
ASSOCIATION, EMPLOYEES' RETIREMENT  
SYSTEM OF THE CITY OF BATON ROUGE  
AND PARISH OF EAST BATON ROUGE, and  
WILLIAM HUFF, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

COMSCORE, INC., SERGE MATTA, MELVIN  
WESLEY III, MAGID M. ABRAHAM, KENNETH  
J. TARPEY, WILLIAM J. HENDERSON,  
RUSSELL FRADIN, GIAN FULGONI, WILLIAM  
KATZ, RONALD J. KORN, JOAN LEWIS,  
RENTRAK CORPORATION, DAVID BOYLAN,  
DAVID I. CHEMEROW, WILLIAM ENGEL,  
PATRICIA GOTTESMAN, WILLIAM LIVEK,  
ANNE MACDONALD, MARTIN O'CONNOR,  
BRENT ROSENTHAL, and RALPH SHAW,

Defendants.

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Case No. 1:16-cv-01820-JGK

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR (I) PRELIMINARY  
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT  
CLASS, (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS, AND  
(IV) A HEARING TO CONSIDER FINAL APPROVAL OF THE SETTLEMENT**

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated December 28, 2017 (the "Stipulation"), attached hereto as Exhibit 1; the Parties' agreed-upon proposed Order Preliminarily Approving Settlement and Providing for Notice and its exhibits attached hereto as Exhibit 2; the accompanying memorandum of law and the accompanying declaration of Jesse L. Jensen in support thereof, and all exhibits attached thereto; and all other papers and proceedings herein, Lead Plaintiffs the Fresno County Employees' Retirement Association ("Fresno") and the Employees' Retirement System of the City of Baton Rouge and Parish of East Baton Rouge ("Baton Rouge"; together with Fresno, "Lead Plaintiffs"), and Named Plaintiff William Huff ("Huff"; together with Lead Plaintiffs, "Plaintiffs") hereby move

this Court, under Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement as within the range of fairness, reasonableness and adequacy; (ii) certifying the Settlement Class and appointing Plaintiffs as Class Representatives and Lead Counsel as Class Counsel, for purposes of the Settlement only; (iii) approving the proposed form and manner of notice to Settlement Class Members; and (iv) scheduling a date and time for the Settlement Hearing to consider final approval of the Settlement and related matters.<sup>1</sup> Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

Dated: January 12, 2018

Respectfully submitted,

/s/ John C. Browne

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*Lead Counsel for Lead Plaintiffs and  
the Settlement Class*

**KESSLER TOPAZ MELTZER &  
CHECK, LLP**  
Sharan Nirmul

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

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